

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE APACHE CORP. SECURITIES
LITIGATION

Case No. 4:21-cv-00575

District Judge George C. Hanks, Jr.

Magistrate Judge Andrew M. Edison

CLASS ACTION

**DIRECT TESTIMONY OF ZACHARY NYE, PH.D.
November 29, 2023**

INDEX OF EXHIBITS

EXHIBIT	DOCUMENT
NYE-DT 1	Curriculum Vitae of Zachary Nye, Ph.D.
NYE-DT 2	Errata Sheet to November 8, 2023 Deposition of Zachary R. Nye, Ph.D.
NYE-DT 3	Expert Report of Zachary Nye, Ph.D., dated April 7, 2023 (Dkt. 101-3)
NYE-DT 4	Expert Report of Lucy P. Allen, dated June 16, 2023 (Dkt. 117-2)
NYE-DT 5	Expert Reply Report of Zachary Nye, Ph.D., dated August 11, 2023 (Dkt. 121-2)
NYE-DT 6	Nye Demonstrative: September 7-10, 2016 Analyst & News Coverage of Apache's Stock Price Movement Following the Alpine High Announcement
NYE-DT 7	Appendix A to Lead Plaintiffs' Memorandum of Law in Opposition to Defendants' Motion to Dismiss Plaintiffs' Consolidated Class Action Complaint: Purportedly False / Misleading Statements Challenged in Consolidated Class Action Complaint, dated April 22, 2022 (Dkt. 74-2)

NYE-DT 8	Document bearing Bates Numbers APACHE_00816376 - APACHE_00816377 [FILED UNDER SEAL]
NYE-DT 9	Nye Demonstrative: Analyst and News Coverage of the October 25, 2019 Announcement of Steve Keenan's Resignation from Apache
NYE-DT 10	Document bearing Bates Numbers APACHE_00000751 – APACHE_00000785
NYE-DT 11	Surreply Report of Lucy P. Allen, dated September 8, 2023 (Dkt. 126-2)
NYE-DT 12	StreetEvents Edited Transcript, <i>Apache Corp. at Barclays CEO Energy-Power Conference</i> (Sept. 7, 2016)
NYE-DT 13	Credit Suisse, <i>Apache Corp. Unveils New, Large Wet Gas Play in Texas, Drills Better Wells in Midland</i> (Sept. 7, 2016)
NYE-DT 14	Morgan Stanley, <i>Resource Response in Alpine High</i> (Sept. 8, 2016)
NYE-DT 15	Seaport Global, <i>SGS Dirty Energy Daily</i> (Sept. 7, 2016)
NYE-DT 16	Credit Suisse, <i>Alpine High Has Potential To Be A World Class Resource</i> (Sept. 8, 2016)
NYE-DT 17	Wells Fargo, <i>APA: Thoughts On Alpine High Discovery</i> (Sept. 7, 2016)
NYE-DT 18	Société Générale, <i>An organic, low cost, 15.5 BBOE Delaware resource capture could cause Street sentiment to change</i> (Sept. 8, 2016)
NYE-DT 19	David Hunn, <i>West Texas discovery puts Apache back in game; Strategy of aggressive exploration goes against grain, analysts say</i> , Houston Chronicle (Sept. 9, 2016)
NYE-DT 20	<i>Rooney v. EZCORP, Inc.</i> , 330 F.R.D. 439 (W.D. Tex. 2019), marked as Nye Deposition Exhibit 6
NYE-DT 21	Credit Suisse, <i>Apache Corporation - Resignation of Exploration Head Highlights Suriname Risk to Share Price</i> (Oct. 25, 2019)

NYE-DT 22	RBC Capital Markets, <i>APA - SVP Resignation Causing Stock Weakness; Company Indicating Not Related to Maka-1 Outcome</i> (Oct. 25, 2019)
NYE-DT 23	SunTrust Robinson Humphrey, <i>Resignation not Linked to Upcoming Suriname Well Result</i> (Oct. 25, 2019)
NYE-DT 24	<i>Apache Shares Plunge Following Scant Update on Oil Prospect</i> , Dow Jones Institutional News (Dec. 2, 2019)
NYE-DT 25	Document bearing Bates Number APACHE_0075551 [FILED UNDER SEAL]
NYE-DT 26	Document bearing Bates Number APACHE_00650756 [FILED UNDER SEAL]
NYE-DT 27	Consolidated Class Action Complaint, filed December 17, 2021 (Dkt. 65)
NYE-DT 28	Dr. Branko Jovanovic & Edward Fox, <i>Testing for Materiality in Volatile Markets</i> , NERA Economic Consulting (Jan. 12, 2010), marked as Nye Deposition Exhibit 7